REMARKS/ARGUMENTS

Applicants thank the Examiner for the careful consideration given the present application, and respectfully request favorable reconsideration of the application in view of the comments set forth below.

Interview Summary – 37 C.F.R. §1.133

Applicants thanks the Examiner for taking the time to conduct a telephone interview with the undersigned attorney on September 15, 2011. During the telephone interview each of the independent claims was discussed in view of the cited art. Specifically, designating addresses included in a table for assignment only to callers and designating other addresses included in the table for assignment only to callees during initiation of tunnel communications was discussed. Applicants appreciate the Examiner's consideration of the proposed language and helpful suggestions of alternative limitations that would better serve to distinguish the claimed invention over the cited references. The Examiner indicated that a further search and analysis was necessary before deciding whether the claims were in condition for allowance.

Specification

Applicants respectfully submit that the claim amendments submitted as part of this communication render the objections to the specification moot. Specifically, there is no limitation in the claims requiring separate tables.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 4, 8, 9, 16, 20, 24, 25, 27, 28, 54 and 59-61 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,614,809 to Verma *et al.* (hereinafter "Verma") in view U.S. Patent Application Publication No. 2004/0236855 to Peles (hereinafter "Peles"), and further in view of what is alleged to be well known in the networking art (hereinafter "Knowledge"). However, Applicants respectfully submit that the combination of Verma, Peles and Knowledge fails to disclose every feature of the amended claims.

Regarding claims 4, 20 and 59, Applicants respectfully submit that the combination of Verma, Peles and Knowledge fails to teach, suggest or otherwise render obvious an address determination part storing a table: comprising a plurality of addresses that are dedicated for assignment only to callers during initiation of the tunnel communications, and separately comprising a plurality of other addresses that are dedicated for assignment only to callees during initiation of the tunnel communications. As claimed, there are a plurality of addresses in the table that can only be assigned to those information-processing devices determined to be callers (e.g., sources), and other addresses in the table that can only be assigned to those information-processing devices determined to be callees (e.g., destinations). The caller addresses are thus dedicated for assignment only to callers and the callee addresses are designated to for assignment only to callees. A caller address will not be assigned to a callee based on other criteria such as a network address, for example, of that information-processing device, and vice versa.

Further, should the status of an information-processing device change from one tunnel communication to a subsequent tunnel communication, different addresses would available to be assigned to that information-processing device to reflect the change in status. For example, an information-processing device may be a caller during a first tunnel communication and a callee during a second tunnel communication. The caller address would be selected during initiation of the first tunnel communication from among the plurality of addresses in the table dedicated for assignment only to callers. Likewise, the callee address would be selected during initiation of the second tunnel communication from among the plurality of addresses in the table dedicated for assignment only to callees. This is true even if the network address of the information-processing device did not change between the first and second tunnel communications.

In contrast, Verma fails to make any distinction between the status of an information-processing device as a source or destination in assigning a tunnel communication address to that information-processing device, much less select from a table comprising dedicated addresses that are only assignable to callers and other dedicated addresses that are only assignable to callees. At most, Verma uses the phrase "tunnel initiator" to refer to the caller and the phrase "tunnel endpoint" to refer to the callee. However, this terminology is simply used to clarify to the reader of Verma the role each terminal plays in a tunnel communication. The terminals in Verma could have been referred to as "Terminal A" and "Terminal B", since Verma makes no distinction in

returning an address for tunnel communications based on the role of the terminals included in such a tunnel communication.

Similarly, Peles describes selecting an existing tunnel to be used for a tunnel communication, and then using the tunnel addresses assigned to the selected tunnel for the information-processing devices. However, according to Peles, the tunnel address is not selected based on the status of the information processing devices as either the caller or the callee. The information-processing device selecting the tunnel addresses for a tunnel communication will return the same address for itself during each tunnel communication based on the tunnel selected, not the status of the information-processing device. In other words, the address determination part of the information-processing device in Peles will always return the local address for itself, and the remote address for the counterpart to the tunnel communication, regardless of the roles of those information-processing devices in the tunnel communication. For the example shown in Table 1 of Peles, if communication is to take place using tunnel 12, the tunnel address 100.1.1.1 will be returned for the information-processing device. This address will be returned for the information-processing device regardless of whether the information-processing device is the caller or the callee. For communications taking place using tunnel 12 in Table 1 of Peles, the tunnel address of the local information-processing device will always be 100.1.1.1, and will not change dependent upon whether that information-processing device is the caller or callee.

Applicants also respectfully submit that the claimed address determination part would not be obvious to one of ordinary skill in the art. Conventionally, heuristic approaches such as DHCP and AutoIP have been utilized to assign tunnel addresses to information-processing devices involved in tunnel communications. Such approaches require information-processing devices to submit an inquiry to a server to determine whether a particular tunnel address is available before assigning the addresses, a step which can possibly be avoided according to the claimed technology.

For at least the above reasons, Applicants respectfully submit that the combination of Verma, Peles and Knowledge fails to teach, suggest or otherwise render predictable every feature recited in claims 4, 20 and 59 as required to maintain a rejection of those claims for purposes of 35 U.S.C. §103(a). Further, Applicants respectfully submit that one of ordinary skill in the art

would not find the absent features obvious in view of the combined teachings of Verma, Peles and Knowledge.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 11-15, 32, 36, 37 and 58 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Verma in view of Peles, and further in view of U.S. Patent No. 7,395,354 to Keane *et al.* (hereinafter "Keane"). However, Applicants respectfully submit that the combination of Verma, Peles and Keane fails to disclose every feature recited in the claims.

Regarding claim 32, for reasons analogous to those discussed above for claims 4, 20 and 59, Applicants respectfully submit that the combination of Verma, Peles and Keane also fails to teach selecting a caller address and a different callee address from a plurality of addresses dedicated for assignment only to callers and a plurality of addresses dedicated for assignment only to callees, respectively. The failure of Verma and Peles, cited in the Office action as teaching such a feature, fails to teach the feature as recited in the amended claims as discussed above. Keane also fails to teach dedicating available addresses only for assignment to one of a caller or a callee.

Further with regard to claim 32, Applicants respectfully submit that at least one of the caller address and the callee address is to be assigned to a different information-processing device involved in a second of the plurality of different tunnel communications. The Office action explains that Keane and Peles teaches using the same address for information-processing devices involved in different tunnel communications. However, Keane describes translating conflicting addresses to avoid a scenario where a common address is used for multiple information-processing devices. In other words, Keane goes to great lengths to avoid assigning common addresses to different information-processing devices. And Peles describes assigning tunnel addresses to information-processing devices taking part in the same tunnel service. ¶[0042]. There is no description in Peles of assigning a common tunnel address to different information-processing devices involved in different tunnel communications as claimed in claim 32.

For at least the above reasons, Applicants respectfully submit that the combination of Verma, Peles and Keane fails to teach, suggest or otherwise render obvious every feature recited in claim 32 as required to maintain a rejection of that claim for purposes of 35 U.S.C. §103(a). Further, Applicants respectfully submit that one of ordinary skill would not find the claimed invention obvious in view of the combined teachings of Verma, Peles and Keane.

The remaining claims in the present application are allowable for the limitations therein and for the limitations of the claims from which they depend.

In light of the foregoing, it is respectfully submitted that the present application is in condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No.: MTIS-40442.

Respectfully submitted,
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